

Plaintiff Enable Mississippi River Transmission, LLC (“Enable”), through its counsel, respectfully submits this Emergency Motion for Leave (“Motion”) to file a short Sur-Reply in Opposition to Defendants’ Motion to Dismiss. The Sur-Reply is attached as Exhibit A to this Motion, and includes four pages of substantive argument. Enable seeks emergency consideration of this Motion, as Enable believes the Sur-Reply would assist the Court in its determination. The Sur-Reply addresses certain caselaw discussed in Defendants’ Reply to Opposition to Motion to Dismiss (Dkt. 71), which was not cited or discussed in Defendants’ Motion to Dismiss (Dkt. 69). A proposed order is attached for the Court’s convenience. Enable requests all further relief as the Court deems just and proper.

Date: March 11, 2019

Of Counsel

BRADLEY MURCHISON KELLY & SHEA
LLC

Joseph L. Shea, Jr.

State Bar No. 00796055

jshea@bradleyfirm.com

Joshua S. Chevalier

La. Bar No. 35706

jchevalier@bradleyfirm.com

401 Edwards Street, Suite 1000

Shreveport, Louisiana 71101

(318) 227-1131

(318) 227-1141 (Fax)

Respectfully submitted,



R. Paul Yetter

State Bar No. 22154200

pyetter@yettercoleman.com

Wyatt J. Dowling

State Bar No. 24074152

wdowling@yettercoleman.com

YETTER COLEMAN LLP

811 Main St., Suite 4100

Houston, Texas 77002

(713) 632-8000

(713) 632-8002 (Fax)

Charles A. Beckham, Jr.

State Bar. No. 02016600

charles.beckham@haynesboone.com

Arsalan Muhammad

State Bar No. 24074771

arsalan.muhammad@haynesboone.com

HAYNES AND BOONE, LLP

1221 McKinney Street, Suite 2100

Houston, Texas 77010

(713) 547-2243

(713) 236-5639 (Fax)

CERTIFICATE OF SERVICE

I certify that, on this March 11, 2019, a copy of the foregoing was served through the Court's Electronic Case Filing System to all parties who have entered an appearance in this adversary proceeding, in accordance with Federal Rule of Bankruptcy Procedure 7005.

A handwritten signature in black ink, appearing to read "Wyatt J. Dowling", is written over a horizontal line.

Wyatt J. Dowling